

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION

Johnston
JAY S. HAMMOND, GOVERNOR

POUCH 0 - JUNEAU 99811

March 27, 1980

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

Mr. Herman A. Schmidt
Manager Lands
Sohio Alaska Petroleum Company
Pouch 6-612
Anchorage, Alaska 99502

RECEIVED
APR 4 1980
PERMITS BRANCH
EPA - REGION 10

Dear Mr. Schmidt:

The Department has reviewed your March 20, 1980 applications for An Air Quality Control Permits to Operate for the new turbines and heaters which you propose to install at existing facilities in the Prudhoe Bay area. We have also evaluated the Radian Corporation PSD Permit Application for the Prudhoe Bay Unit Produced Water Injection, Low Pressure Separation and Artificial Lift Project dated September 28, 1979.

Based on this evaluation, the Department has determined that:

- a) The increased emissions of particulate matter, sulfur dioxide, nitrogen oxides and carbon monoxide will not cause violations of the Alaska Ambient Air Quality Standards.
- b) Sulfur dioxide and particulate matter emissions from the turbines and heaters will not exceed the standards specified in 18 AAC 50.050, so long as natural gas is the only fuel burned.

Therefore, amended Permits AQC-351B, 352D and 353B are granted for the construction, installation, and operation of the new turbines, and heaters at Gathering Centers 1, 2 and 3. In addition, Permit AQC-534 is granted for operation of sixteen (16) 10 mm Btu/hr gas-fired heaters, one each to be installed at the sixteen drill pads in the western portion of the Prudhoe Bay Field. Please note the permits expire January 30, 1985 and you should request renewal at least thirty days prior to their expiration dates.

USEPA REG
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The new turbines must also comply with certain federal standards promulgated in 40 CFR 60 Subpart GG on September 10, 1979. Please contact Mr. Robert Chivvis, of the U.S. Environmental Protection Agency Alaska Operations Office in Anchorage at 271-5083, for specific requirements. These facilities must also be reviewed for compliance with the Prevention of Significant Deterioration Provisions of the Clean Air Act Amendments of 1977. Mr. Michael M. Johnston of the U.S. Environmental Protection Agency Region X Office in Seattle, is responsible for this review.

You have a right to an adjudicatory hearing to contest the Department's action. A request for an adjudicatory hearing must be made within 30 days of receipt of this letter by mailing or delivering a statement of issues to the Alaska Department of Environmental Conservation, Pouch O, Juneau, Alaska, 99811. The statement of issues must state the basis for the hearing request and otherwise conform with AS 44.62.370. A failure to request a hearing within 30 days of receipt of this letter constitutes a waiver of your right to administrative or judicial review of this action.

Sincerely,

C. Deming Cowles

C. Deming Cowles
Deputy Commissioner

Enclosure: AQC-351B
AQC-352D
AQC-353B
AQC-534

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONTROL
PERMIT TO OPERATE

Permit No. AQC-534

Date of Issue: *March 27, 1980*

The Department of Environmental Conservation, under the authority of AS 46.03 and 18 AAC 50.120, issues an Air Quality Control Permit to Operate to

SOHIO ALASKA PETROLEUM COMPANY
POUCH 6-612
ANCHORAGE, ALASKA 99502

for the operation of the sixteen 10 mm Btu/hr natural gas-fired process heaters as described in the Radian Corporation "PSD Permit Application for the Prudhoe Bay Unit Produced Water Injection, Low Pressure Separation and Artificial Lift Project" dated 28 September 1979 and SOHIO Alaska Petroleum Company letter with attachments dated March 20, 1980

Located at various drill pads in the Prudhoe Bay Field, Prudhoe Bay, Alaska

Under the conditions:

1. Permittee shall comply with the State Ambient Air Quality Standards established in Section 020 and the applicable emission limitations specified in Section 050 of the State Air Quality Control Regulations 18 AAC 50.
2. Air Contaminant Emission Reports, as described in Exhibit A, shall be submitted to the Department annually by January 30 each year.
3. Permittee shall maintain and operate all fuel burning equipment to provide optimum fuel burning efficiency during all operating periods.
4. The Department, with permittee's approval, is allowed access to permittee's facilities to conduct scheduled or unscheduled inspections or tests to determine compliance with this permit and State environmental laws and regulations.
5. A copy of this permit shall be clearly displayed, and the State Air Quality Control Regulations 18 AAC 50 kept on file, at the permitted facility location.

This permit expires 30 January 1985 and may be suspended or revoked in accordance with 18 AAC 50.130.

C. Deming Cowles

DEPUTY COMMISSIONER
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

EXHIBIT A
PERMIT TO OPERATE AQC-534
AIR CONTAMINANT EMISSION REPORT

A notarized Air Contaminant Emission Report shall be submitted annually to the Department by January 30 each year. This report is to be submitted for any period during which the equipment is tested or operated. The report shall include, but not be limited to the following information:

NAME OF FIRM
LOCATION OF FACILITIES
PERIOD OF REPORT

- | | 1st
Quarter | 2nd
Quarter | 3rd
Quarter | 4th
Quarter |
|---|---|----------------|----------------|----------------|
| 1. DAYS OPERATED | (total days or hours per quarter for each heater) | | | |
| 2. FUEL CONSUMPTION | (total mmcf for all heaters) | | | |
| 16 natural gas-fired heaters installed after 28 Sep 1979 totaling 160 mm Btu/hr | | | | |
| 3. | Attach a detailed description of equipment failures or operating conditions which may have adversely affected air contaminant emissions. A preliminary report of the incident shall be submitted to the Regional Environmental Supervisor, Northern Regional Office, P.O. Box 1601, Fairbanks, Alaska 99701, phone (452-1714) within five (5) working days of the incident.

Include such information as: date of incident, duration, nature of the occurrence, equipment failures, steps taken to minimize emissions, measures taken to avoid recurrence, and a general description of the weather. A separate report is required for each incident. | | | |
| 4. | Signature of authorized agent preceded by the statement: "I _____, being first duly sworn, hereby certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete and accurate." | | | |
| 5. | Notarization: "Subscribed and sworn to before me this _____ day of _____ (month), _____ (year) _____ (city & state)." | | | |

Notary Public's Signature,
commission, date of expiration,
seal.